

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Alexander Harvin,)	
)	
Plaintiff,)	CIVIL ACTION NO.
)	
v.)	1:21-CV-03355-MHC
)	
JPMorgan Chase Bank, N.A.,)	
Nationwide Title Clearing, Wargo &)	
French, L.P., Kutak Rock, L.P.,)	
Aldridge Pite, L.P.,)	
)	
Defendants.)	
)	
)	

**DEFENDANTS' JOINT MOTION TO
STAY INITIAL DISCOVERY DEADLINES**

In the interest of efficiency and judicial economy, and as set out in the accompanying brief, Defendants JPMorgan Chase Bank, N.A. (“Chase”), Kutak Rock LLP (“Kutak”), Wargo & French, LLP (“Wargo”), and Aldridge Pite, LLP (“Aldridge”) (collectively, “Defendants”) hereby move for a stay, until the Court rules on Defendants’ pending motions to dismiss for failure to state a claim, of the initial discovery deadlines stated in Local Rule 16.1 (early planning conference), Local Rule 16.2 (joint preliminary report and discovery plan), Local Rule 26.1(A) (initial disclosures), and of any obligation to respond to any discovery served by

pro se Plaintiff Alexander Harvin. If Defendants' motions to dismiss are denied, Defendants respectfully request the aforementioned initial discovery deadlines run from the date Defendants must file their answers (fourteen days after notice of the Court's action on the motions to dismiss under Federal Rule of Civil Procedure 12(a)(4)). In support of this Motion, Defendants rely on and incorporate herein the accompanying Brief in Support.

Respectfully submitted this 25th day of October, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2021, I electronically filed **DEFENDANTS' JOINT MOTION TO STAY INITIAL DISCOVERY DEADLINES** and **DEFENDANTS' BRIEF IN SUPPORT OF JOINT MOTION TO STAY INITIAL DISCOVERY DEADLINES** with the Clerk of the Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

Dallas R. Ivey
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I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

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